

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETRÓLEOS DE VENEZUELA, S.A., PDVSA
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs,

- against -

MUFG UNION BANK, N.A. and GLAS AMERICAS
LLC,

Defendants.

Case No: 19-cv-10023-KPF

NOTICE OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the declaration of James R. Bliss dated June 10, 2020 and the exhibits thereto, the declaration of Allan R. Brewer-Carías dated June 9, 2020 and the exhibits thereto, the declaration of David C. Hinman dated June 9, 2020 and the exhibits thereto, Plaintiffs' annexed statement of material facts pursuant to Local Civil Rule 56.1, Plaintiffs' accompanying memorandum of law, and all of the pleadings and proceedings herein, Plaintiffs will move this Court before the Honorable Katherine Polk Failla at 40 Foley Square, New York, New York on August 12, 2020 at 2:00 p.m. (EST) for an order pursuant to Federal Rule of Civil Procedure 56 (i) granting summary judgment in Plaintiffs' favor and against Defendants on all claims, counterclaims, and defenses, (ii) declaring that the 2020 Notes,¹ the Indenture, and the Pledge are invalid, illegal, null and void *ab initio*, and thus unenforceable, and (iii) enjoining Defendants, any owners or holders of the 2020 Notes or beneficial interests therein, and any other parties claiming an interest in the 2020 Notes or a security interest in the purportedly pledged CITGO Shares, from

¹ Capitalized terms have the same meanings as in Plaintiffs' accompanying memorandum of law.

attempting to enforce the 2020 Notes, the Indenture, or the Pledge or from otherwise attempting to exercise any rights, remedies, or privileges purportedly arising from a default or Event of Default under the Indenture or the Pledge.

PLEASE TAKE FURTHER NOTICE that any opposition to this motion shall be filed and served on or before June 29, 2020 and that Plaintiffs' reply shall be filed and served on or before July 15, 2020.

[remainder of page left intentionally blank]

Dated: June 10, 2020

Respectfully submitted,

/s/ Kurt W. Hansson

Kurt W. Hansson
James R. Bliss
James B. Worthington

PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
kurthansson@paulhastings.com
jamesbliss@paulhastings.com
jamesworthington@paulhastings.com

*Attorneys for Plaintiffs and Counterclaim
Defendants Petróleos de Venezuela, S.A. and
PDVSA Petróleo, S.A.*

/s/ Jeffrey B. Korn

Jeffrey B. Korn
Michael Gottlieb
Nicholas Reddick
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, NY 10019
Telephone: (212) 728-8000
Facsimile: (212) 728-8111
jkorn@willkie.com

1875 K Street NW
Washington, DC 20006-1238
Telephone: (202) 303-1442
Facsimile: (202) 303 2442
mgottlieb@willkie.com
nreddick@willkie.com

*Attorneys for Plaintiff and Counterclaim Defendant
PDV Holding, Inc.*